# Section X—Local Responsibilities

# Complying with Statutory Reporting Requirements

Public notification of accountability results and campus planning are governed by multiple statutory requirements. These are described in this subsection.

## **AEIS Report**

Each board of trustees shall publish an annual report describing the educational performance of the district and of each campus in the district and include the campus performance objectives and the progress of each campus toward those objectives. The annual report must also include the performance rating of each campus in the district. The report shall include a comparison provided by the Central Education Agency of a variety of performance, student, staff, and financial information and must include the amount, if any, of the school district's unencumbered surplus fund balance as of the last day of the preceding fiscal year and the percentage of the preceding year's budget that the surplus represents. Supplemental information to be included in the reports shall be determined by the local board of trustees. [TEC §39.053 (a), (c)-(d), (f)]

**PUBLIC DISCUSSION OF THE ANNUAL PERFORMANCE REPORT [AEIS Reports].** The board of trustees shall hold a hearing for public discussion of the annual performance report (AEIS). The board of trustees shall notify property owners and parents in the district of the hearing. After the hearing, the report shall be widely disseminated within the district. [TEC §39.053 (b)]

The district-level decision making committee must hold at least one public meeting annually after the receipt of the agency-generated portion of the annual performance report for the purpose of discussing the performance of the district and the district performance objectives. [TEC §11.252 (e)]

### Ratings

**PUBLIC DISCUSSION OF DISTRICT AND CAMPUS RATINGS**. Each campus site-based decision making committee shall hold at least one public meeting annually after the receipt of the annual campus accountability rating (released with the complete data tables on August 1 or September 1) for the purpose of discussing the performance of the campus and the campus performance objectives. [TEC §11.253 (g)] The confidentiality of the performance results should be evaluated before considering public release of the complete data table.

If a district is rated *Academically Unacceptable* or a campus is rated *Low-performing*, the board of trustees must conduct a hearing to notify property owners and parents in the district of the rating, the improvements in performance expected by the Central Education Agency, and the sanctions which may be imposed if the performance does not improve. For Low-performing campuses the hearing should also solicit public comment on the initial steps being taken to improve performance. [TEC §39.073 (d) and TEC §39.131 (a),(b)]

Boards of trustees should attempt to comply with the spirit of the statute in the most efficient ways possible. Where meetings and hearings required by various statutes can be combined, it is appropriate to do so.

# **Development of Local Accountability Systems**

Although the statewide accountability system has been designed to address the guiding principles articulated in Section I, *Introduction*, it is not a comprehensive system of performance evaluation. Communities across Texas have varied needs and goals for the school districts educating their students and local systems of accountability need to address those priorities. The state system is meant to be a starting point for locally developed accountability systems.

Districts are encouraged to continue to develop their own complementary local accountability systems to plan for the year 2000 performance and beyond. Such systems are entirely voluntary and for local use only. Performance on locally defined indicators which are not part of the AEIS will not impact the accountability ratings determined through the statewide system.

Districts may choose to expand the accountability system with additional indicators appropriate for local evaluation. Examples of locally maintained indicators include:

# Local Systems (cont.)

level of parent participation;

progress on locally administered assessments;

progress on goals identified by campus improvement plans;

progress compared to other schools in the district;

progress on professional development goals;

school safety measures.

As a different approach, districts may choose to expand the state-designated accountability ratings. For example, further differentiation among schools rated *Acceptable* may be desired. A local decision would be made regarding the criteria upon which to subdivide this category.

Yet a third approach is to examine those base indicators both currently in use and planned for implementation which fall short of local expectations. Additional performance measures could be constructed to track efforts to improve performance in those areas.

Irrespective of the strategy chosen, local accountability systems should be designed to serve the needs of the local community and to improve performance for all students.

# **Opportunities for Data Correction**

Each data source for the Academic Excellence Indicator System has a prescribed process and calendar for correcting errors or omissions discovered after the original submission. The accuracy of ratings, acknowledgments, recognitions, and reports is wholly dependent on the accuracy of the information submitted. Districts are responsible for submitting all AEIS data with the exception of college admissions tests results, which are transmitted by the testing companies. The opportunities for correction for each indicator used to determine ratings or acknowledgments are described in this section.

# Person Identification (PID) Updates

PID changes have profound ramifications throughout the Texas public education data system. Year-to-year and collection-to-collection matching is dependent upon stable PID records. *PEIMS Data Standards* should be followed to insure that PID updates submitted by districts are processed.

Demographic changes to PID records which are not flagged by marking the Demographic Revision Confirmation Code are not processed by PEIMS. Therefore, changes to name spellings, birth date, ethnicity, or any other information on the record do not update the permanent PID record in agency data files unless this revision code is marked. When the revision code is marked the entire record is replaced with the update.

Changes to pre-slugged TAAS answer documents **do not** update the permanent PID record for that student; however, they do affect the construction of the TAAS accountability subset and student groups.

#### TAAS

Districts have a specified amount of time to correct demographic information coded on the TAAS answer sheets. Only the errors identified and corrected during the correction period will be reflected in the partial data tables (Part II) generated by test contractor. The contractor will process corrections made after the deadline, but those changes will not be reflected in the accountability (or October) subset of results.

**Traditional Calendar Districts and Schools.** All districts with traditional calendar schools will receive from the testing contractor their TAAS summary sheets (which include all test takers) by the end of May. Districts have until June 6, 1997 to review their results and correct any demographic data errors which may have resulted from improperly coded answer sheets. This is a week longer than last year because the test was given a week earlier in 1997 than in 1996.

The accountability data tables (Part II) and the spring 1997 AEIS preview reports, which include only the October subset of test takers, will be sent to districts by the test contractor by the end of June. The accountability data table will contain the TAAS results used to determine accountability ratings and acknowledgments.

# TAAS Corrections (cont.)

**Year-Round Education Districts and Schools.** All districts which tested students in the optional test administration in June will receive from the testing contractor their TAAS summary sheets (which include all test takers) by the second week of July. Districts have until July 18 to review their results and correct any errors which may have resulted from improperly coded answer sheets.

The accountability data tables Part II and the spring 1997 AEIS preview reports, which include only the October subset of test takers, will be sent to these districts by the test contractor by the first week in August. The accountability data table will contain the TAAS results used to determine accountability ratings and acknowledgments.

# Dropouts, Graduates, Enrollment

In 1996-97, PEIMS Submission 1, which includes 1995-96 dropout and graduate reporting, as well as 1996-97 enrollment, allowed for a resubmission correction period from mid-December 1996 to January 30, 1997. This is the vehicle through which districts should have corrected any erroneous information initially submitted regarding dropouts, graduates, and enrollment.

#### **Attendance**

In 1995-96, PEIMS Submission 3 in which districts reported 1995-96 cumulative attendance, allowed for a resubmission correction period which for most districts extended through September 1996. This was the means by which districts should have corrected any erroneous information initially submitted regarding attendance.

# College Admissions Testing

College admissions results are provided to the Texas Education Agency by the College Board and the American Testing Program. The school to which scores are attributed is identified by the student taking the test. Schools are encouraged to verify campus summary information on the SAT I and ACT as soon as they are received. Discrepancies should be reported to the testing companies, not TEA.

# Appeals Related to the 1997 Accountability Ratings

#### General Instructions

Superintendents are provided the opportunity to appeal data used to determine accountability ratings under a limited set of circumstances, within a defined time limit. General appeal parameters are outlined below:

Campus and district appeals must be written and submitted under the signature of the district superintendent.

For any district or campus, only one opportunity will be permitted to appeal on any indicator.

**Appeals are not a data correction opportunity!** Appeals must be based upon a data or calculation error solely attributable to the Texas Education Agency, regional education service centers, or the test contractor for the student assessment program. Problems due to *district* errors in PEIMS data submissions or on TAAS answer sheets do not constitute a valid basis for appeal. Further, statute permits consideration of data reporting quality when assigning ratings.

Only appeals which would result in ratings changes will be considered by the commissioner.

Appeals will not be considered prior to district receipt of partial accountability data tables (Parts I and II) in late June. With the exception of attendance appeals received by July 15 for *Exemplary* and *Recognized*, resolution by August 1 is not guaranteed.

Appeals for Additional Acknowledgment indicators will not be considered by the commissioner.

The decision of the commissioner of education is final.

## TAAS Appeals

TAAS information may be appealed if a problem is identified with the accountability subset of results reported on the accountability data tables (Part II). This appeal should reflect a serious problem such as a missing grade or campus, and not be based on demographic errors that should have been corrected during the designated correction window.

## **Dropout Appeals**

After the PEIMS resubmission period, TEA will apply the dropout recovery process to the data. In April, the agency will provide to districts the accountability dropout counts and rates for all students and each student group, as well as lists of recovered and unrecovered dropouts. The source of recovery will be provided for dropouts on the recovered list.

Any dropouts coded on 1996-97 PEIMS Submission 1 with one of the following dropout reason codes is removed from the dropout count for accountability purposes as part of the state-level dropout recovery process. (See *1996-97 Data Standards* for fuller descriptions.)

- a foreign student returning to his / her home country;
- a student expelled for criminal behavior;
- a student meeting all graduation requirements except passing the exit-level TAAS;
- a student withdrawing from school to enroll in an alternative or GED program, under certain circumstances; or
- a student entering college to work toward a degree.

Districts may not appeal dropouts that the district should have coded, but failed to code, with one of these reason codes. Again, accountability appeals must be based on errors attributable to TEA, not district reporting errors.

# Attendance Appeals

For districts or campuses that meet all TAAS and dropout standards for the *Exemplary* or *Recognized* ratings, but fail to meet the attendance rate standard, the superintendent may request the use of current year attendance in the ratings evaluation, if current year attendance meets or exceeds the standard of 94.0 percent. 1995-96 attendance rates will be printed on the accountability data tables (Part I) provided by TEA in June. Every attempt will be made to resolve attendance appeals submitted before July 15, 1997 by the August 1, 1997 ratings release. Appeals submitted on or after July 15, 1997 will be resolved after August 1, 1997. A notarized copy of 1996-97 attendance rates must be submitted as part of the appeal.

## 1997 Appeal Deadlines

Superintendents have a limited window in which to submit an appeal to the commissioner of education.

August 1 ratings may be appealed through August 31.

September 1 ratings may be appealed through September 30.

Appeals may be transmitted to the agency from the time of receipt of the partial data tables (June) through the end of the rating appeal window (August 31 or September 30).

# How to Submit an Appeal

Superintendents appealing data used to determine an accountability rating should prepare a written request to the commissioner of education which identifies:

The district and / or campuses for which the appeal is being submitted;

The data in question;

The perceived error;

The reason(s) why the perceived error is attributable to the Texas Education Agency, a regional education service center, or the test contractor for the student assessment program; and

The reason(s) why the perceived error would change the rating of the district or school.

When student-level information is in question, supporting information must be provided for commissioner review, *i.e.*, a list of the students in question by name and identification number must be provided. It is insufficient to claim data are in error without providing information with which the appeal can be evaluated. More than one indicator can be appealed in the same letter.

# Appeal Examples

Examples of acceptable and unacceptable appeals are provided for illustration.

#### **Acceptable Appeals:**

Dear Commissioner Moses.

I have analyzed the TAAS results for Elm Street Elementary and am unable to reconcile the counts of economically disadvantaged students to the test taker totals on the partial accountability data table received from the test contractor. Only 35 of my students are shown as economically disadvantaged, when in fact 98 of the 200 tested should be.

Attached is a list of the students at the school whom I believe are part of the accountability subset and who should be coded as economically disadvantaged. Student names, PIDs, and economic status are provided. Correcting this error should raise the school's rating to Acceptable.

Sincerely,

John Q. Educator Superintendent of Schools

Dear Commissioner Moses,

According to my analysis, Elm Street Elementary meets all criteria for receiving the Recognized rating with the exception of the attendance rate. Attached is a notarized copy of the 1996-97 cumulative attendance for grades 1 - 5 which is derived from my 1996-97 PEIMS Submission 3. As you will note, the attendance rate for the current school year is 94.2 percent which exceeds the 94 percent standard, and therefore, may be substituted for use in the 1997 ratings evaluation.

Sincerely,

John Q. Educator Superintendent of Schools

#### **Unacceptable Appeals:**

Dear Commissioner Moses,

I have analyzed the TAAS results for Elm Street Elementary and believe that there is an error in the counts of economically disadvantaged students. I believe the appropriate count to be 98 rather than 35.

Sincerely,

John Q. Educator Superintendent of Schools

Dear Commissioner Moses,

According to my analysis, Elm Street Elementary meets all criteria for receiving the Recognized rating with the exception of the attendance rate. Please substitute 1996-97 attendance data when determining the 1996 rating.

Sincerely,

John Q. Educator Superintendent of Schools

# How an Appeal Will Be Processed

Once an appeal is received by the commissioner, a standard process for reviewing the information will be followed. This process is detailed below:

The commissioner of education receives an appeal, prepared under signature of the district superintendent.

The commissioner forwards appeals to the Office of Policy Planning and Research for review.

The Office of Policy Planning and Research coordinates any research necessary to evaluate the claims in the appeal. In the case of TAAS and dropout appeals, the Texas Education Agency will examine all relevant data, not just the students specifically named in the correspondence. Once the research is complete, a recommendation is prepared for the commissioner.

The commissioner examines the appeal, supporting documentation, agency research, and staff recommendation.

The commissioner will make a final decision regarding the appeal.

The superintendent will be notified in writing of the commissioner's decision and the rationale upon which the decision was made.

# Accreditation Investigations

## On-site Investigations

Texas Education Code §39.074 permits the raising or lowering of performance ratings as a result of on-site investigations. On-site accreditation visits are currently scheduled only for campuses rated *Low-performing* and districts rated *Academically Unacceptable*. If the investigative team determines that a change in the accountability rating should be considered, the commissioner will review the relevant performance data and site-visit reports and make a decision regarding the proposed rating change. If the commissioner determines that a change in rating is appropriate, the district will be notified in writing.

### Special Accreditation Investigations

The commissioner, using the authority granted to him in *Texas Education Code* §39.075 and §39.131 may lower the accreditation status of a district based on the results of a special accreditation investigation (SAI). Problems in governance, finances, testing practice, and administrative management are among the reasons such an investigation can be initiated. The district rating shall be changed to *Unacceptable: SAI*, and that rating will remain in effect until the commissioner sees that significant progress is being made in the problem areas. Therefore, a district rating based on standard evaluation of base indicators will not be awarded until the commissioner lifts the *Unacceptable: SAI* rating.